LeMond Cycling, Inc. v. Trek Bicycle Corporation Doc. 129

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

LeMond Cycling, Inc.,	
Plaintiff,	Civil No. 08-1010 (RHK-JSM)
v.	Judge Richard H. Kyle Magistrate Judge Janie S. Mayeron
Trek Bicycle Corporation,	
Defendant/Third-Party Plaintiff,	Date: July 29, 2009 Time: 10:30 a.m. Judge: Magistrate Janie S. Mayeron
v.	
Greg LeMond,	
Third-Party Defendant.	

DECLARATION OF JENNIFER M. ROBBINS IN OPPOSITION TO TREK'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES, TO DEEM FACTS ADMITTED, AND FOR EXPENSES

I, Jennifer M. Robbins, hereby declare as follows:

1. I am one of the attorneys representing Plaintiff LeMond Cycling, Inc. and Third-Party Defendant Greg LeMond in this case. I make this declaration in opposition to Trek's Motion to Compel Answers to Interrogatories, to Deem Facts Admitted, and for Expenses.

2. On July 2, 2009 I participated in a meet and confer with Kristal Stippich and Christopher Domrowicki from Gass Weber Mullins, LLC, as well as with Christopher W. Madel from Robins, Kaplan, Miller & Ciresi LLP. During the meet and confer, Plaintiff's counsel explained that one of the reasons Plaintiff

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was unable to respond to Trek's Interrogatory No. 11 was because it was overly broad and unduly burdensome with regard to the amount of detail required to answer it.

3. Attached to this Declaration as Exhibit A is a true and correct copy of the Thomas Fox Statement in Case concerning Trek and Greg LeMond.

4. Attached to this Declaration as Exhibit B is a true and correct copy of John R. Nevin Expert Report.

5. Attached to this Declaration as Exhibit C is a true and correct copy of *St. Luke's Cataract and Laser Inst., P.A. v. Sanderson*, No. 8:06-CV-223-T-MSS, 2006 WL 1320242 (M.D. Fla. May 12, 2006).

6. Attached to this Declaration as Exhibit D is a true and correct copy of *Shqeirat v. U.S. Airways Group, Inc.*, Civil No. 07-1513 (ADM/AJB), 2008 WL 4232018 (D. Minn. Sept. 9, 2008).

7. Attached to this Declaration as Exhibit E is a true and correct copy of *Mancini v. Insur. Corp. of New York*, Civil No. 07cv1750-L(NLS), 2009 WL 1765295, (S.D. Cal. June 18, 2009).

8. Attached to this Declaration as Exhibit F is a true and correct copy of the June 9, 2009 Expert Report of Jay Townley.

Executed this 20th day of July, 2009.

/s/ Jennifer M. Robbins
Jennifer M. Robbins

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